

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RONDA DANNER,

Plaintiff,

Case No. 2:22-cv-11498

HONORABLE STEPHEN J. MURPHY, III

v.

LEADING HEALTHCARE
SOLUTIONS, INC.,

Defendant.

_____ /

**STIPULATED ORDER TO EXTEND
TIME FOR DEFENDANT LEADING HEALTHCARE
SOLUTIONS, INC. TO RESPOND TO SECOND AMENDED COMPLAINT**

NOW COME Plaintiff Ronda Danner and Defendant Leading Healthcare Solutions, Inc. (hereinafter “LHS”), by and through their respective undersigned counsel of record, and agree to extend the deadline for Defendant LHS to respond to Plaintiff’s Second Amended Complaint dated August 15, 2023 (“Second Amended Complaint”), up to and including Tuesday, September 19, 2023. In support of the Stipulation, the parties state as follows:

1. On August 15, 2023, Plaintiff filed the Second Amended Complaint against Defendant LHS.
2. LHS’s deadline to respond to Plaintiff’s Second Amended Complaint is August 29, 2023.
3. Counsel for LHS has other pre-existing professional commitments, including a pretrial submission deadline on August 29, 2023. Further, the parties

are discussing potential resolution of Danner's claims against LHS.

4. Counsel for LHS has contacted Plaintiff's counsel and obtained his agreement to extend LHS's deadline to respond to the Second Amended Complaint by 21 days – or until September 19, 2023.

5. There are currently no case management deadlines set in this matter and this request is made in good faith and not for the purposes of delay.

6. Counsel for Plaintiff concurs in the extension up to and including Tuesday, September 19, 2023, for Defendant LHS to respond to the Second Amended Complaint.

Accordingly, the parties agree that Defendant LHS shall have until **Tuesday, September 19, 2023**, to respond to Plaintiff's Amended Complaint.

SO ORDERED.

s/ Stephen J. Murphy, III
STEPHEN J. MURPHY, III
United States District Judge

Dated: August 29, 2023

s/ Avi R. Kaufman (w/ permission)
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Counsel for Plaintiff
Dated: August 28, 2023

s/ Irina N. Kashcheyeva
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Dated: August 28, 2023